

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

**H-D U.S.A., LLC and HARLEY-
DAVIDSON MOTOR COMPANY
GROUP, LLC,**

Case No. 2:17-cv-00711

Plaintiffs,

JURY TRIAL REQUESTED

vs.

**SUNFROG, LLC d/b/a SUNFROG
SHIRTS and JOHN DOES,**

Defendants.

DECLARATION OF KATHERINE W. SCHILL

I, Katherine W. Schill, declare as follows:

1. I am an adult resident of the State of Wisconsin and am one of the attorneys representing the Plaintiffs in the above-captioned matter.

2. I make this declaration based on personal knowledge of the facts stated.

3. Attached as Exhibits 1-10 are true and correct copies of the following unpublished cases, which are cited in the Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction:

Exhibit 1: *Coach, Inc. v. Treasure Box, Inc.*, 2013 WL 2402922 (N.D. Ind. 2013);

Exhibit 2: *Coach, Inc. v. Richie's Playhouse Inc.*, 2013 WL 594243 (E.D. Mich. Feb. 15, 2013);

Exhibit 3: *Coach, Inc. v. Island Rayz*, 2013 WL 1499610 (S.D. Ohio April 11, 2013);

Exhibit 4: *Coach Inc. v. Horizon Trading USA, Inc.*, 2012 WL 5451274 (S.D.N.Y. Nov. 7, 2012);

Exhibit 5: *Coach, Inc. v. Becka*, 2012 WL 5398830 (M.D. Ga. Nov. 2, 2012);

Exhibit 6: *Waukesha Floral & Greenhouses, Inc. v. Possi*, No. 15-CV-1365, 2016 WL 928680 (E.D. Wis. Mar. 8, 2016);

Exhibit 7: *H-D Michigan, LLC v. Hellenic Duty Free Shops S.A.*, No. 2:11-CV-00742, 2011 WL 3903278 (E.D. Wis. Sept. 6, 2011);

Exhibit 8: *Packaging Supplies, Inc. v. H-D, Inc.*, No. 08-CV-400, 2011 WL 1811446 (N.D. Ill. May 12, 2011);

Exhibit 9: *H-D Michigan, LLC v. Hannon*, No. 09-378-P-S, 2009 WL 3762445, (D. Me. Oct. 28, 2009);

Exhibit 10: *H-D Michigan LLC v. Bryan C. Broehm*, Opposition No. 91177156, 2009 WL 1227921 (TTAB 2009).

2. Attached as Exhibit 11 is a true and correct copy of SunFrog's reply to Plaintiff's Response to Motion to Dismiss, filed in *Methodist Le Bonheur Healthcare v. SunFrog LLC*, No. 2:2016-cv-02718, Dkt. 21 (W.D. Tenn. Sept. 2, 2016).

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 30th day of May, 2017.

s/Katherine W. Schill

Katherine W. Schill